

Sonia I. Reyes Ortiz
Urb. Altos de la Fuente
E-1 calle 2
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Claim# 32116

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SAN JUAN, P.R.

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of
THE COMMONWEALTH OF PUERTO RICO, et
al.,

Debtors. 1

PROMESA
Title III

No. 17 BK 3283-LTS
Jointly Administered)

**This filing relates to the
Commonwealth and ERS.**

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SAN JUAN, P.R.

OBJECCION

Yo Sonia I. Reyes Ortiz que resido en Urb. Altos de la Fuente calle 2 E-1 Caguas, Puerto Rico 00727 que he trabajado en el gobierno de Puerto Rico en las siguientes agencias:

Departamento del Trabajo y Recursos Humanos 1988-1989

Centro Judicial de Caguas, P.R. 1989-1990

Departamento de la Familia (Asume) 1995 hasta el presente

El Estado Libre Asociado de Puerto Rico me adeuda un ajuste de salario mínimo federal y el patrono debe determinar cuanto es la cantidad. Adjunto documentación solicitada.

IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM BECAUSE THEIR RECORDS SHOW THAT YOUR CLAIM IS DEFICIENT.

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
REYES ORTIZ, SONIA I	32116	5/25/2018	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$0.00
Reason:	Proof of claim purports to assert liabilities associated with the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico or any of the other Title III debtors			

SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES SOLICITAN QUE SU RECLAMO SEA RECHAZADO, PUESTO QUE LOS DATOS INDICAN QUE SU RECLAMO ES DEFICIENTE.

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
REYES ORTIZ, SONIA I	32116	5/25/2018	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$0.00
Base para:	La evidencia de reclamación tiene la intención de formular las responsabilidades asociadas con el Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico, pero no proporciona los fundamentos ni la documentación de respaldo para formular una reclamación contra dicho sistema, de manera que los Deudores no pueden determinar si el reclamante tiene una reclamación válida contra el Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico o cualquiera de los otros deudores en virtud del Título III.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

Copias de la Objeción global, y todos los escritos radicados en el marco de las causas conforme al Título III, están disponibles, de manera gratuita, en <https://cases.primeclerk.com/puertorico>. Si tiene alguna pregunta, comuníquese con Prime Clerk LLC llamando al (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (para llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos español).

*****CUST PR 1845 SRF 38154 PackID: 782 MMLID: 1563124 SVC: 104th Omni
REYES ORTIZ, SONIA I
Urb Altos de la Fuente E1 Calle 2
Caguas , PR 00727**

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**VERIFIED STATEMENT PURSUANT TO FRBP 2019
OF THE BELTRÁN-CINTRÓN PLAINTIFF GROUP**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rule 2019”) and Section V.B. of the *Fourth Amended Notice, Case Management and Administrative Procedures* Order entered in Docket Entry 2839 on April 4, 2018 (the “Case Management and Administrative Procedures Order”), the present verified statement (the “Statement”) is submitted by the Group of those certain 4,953 Plaintiffs in the case of Francisco Beltrán-Cintrón *et al v.* Family Department of Puerto Rico *et seq.*, Civil Case Num. K AC2009-0809 in the Court of First Instance of San Juan (“CFI”), all creditors of the estate (collectively the “Beltrán-Cintrón Plaintiff Group”)².

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The present Statement is filed in accordance to the Case Management and Administrative Procedures Order in connection with the cases (“Title III Cases”) commenced by the above-captioned debtors under title III of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”).

In support of the Statement, the Beltrán-Cintrón Plaintiff Group hereby respectfully state as follows:

BACKGROUND

1. As of May 3, 2017 (the “Petition Date”) and up to and including the date of this Statement, in these Title III Cases, the undersigned counsel represented [and continues to represent] the Beltrán-Cintrón Plaintiff Group (each Plaintiff in the Group constitutes a “Member” thereof).

2. On November 2, 2009, the Beltrán-Cintrón Plaintiff Group filed a complaint against the Commonwealth, Civil Case Num. K AC2009-0805, seeking declaratory judgment for the nullity of General Memorandum 5-86 of the Central Office for the Administration of Personnel (“Ocap” for its initials in Spanish), and the consequent correction of the regular rate of pay due to the illegal implementation of such regulation, which resulted in inoperative pay scales (the “Cause of Action”). Therefore, for purposes of Bankruptcy Rule 2019(c), the Beltrán-Cintrón Plaintiff Group was formed on November 2, 2009.

3. As of the Petition Date, the Beltrán-Cintrón Plaintiff Group had been litigating the Cause of Action against the Commonwealth for seven (7) years, and a Motion for Summary Judgment with a Stipulation of Uncontested Facts with the Commonwealth had been filed and was under advisement of the CFI. As of the Petition Date, a determination by the Supreme Court of Puerto Rico, in Case Num. AC-2016-0110, as to whether the case should be entertained in the CFI or in the Administrative Forum (Appellate Commission of Public Service “CASP”), was pending³.

³ On January 27, 2017, the request for such determination in this case was consolidated by the Supreme Court of Puerto Rico with an identical request in the Case of Jorge Abraham-Giménez, Case Num. AC-2016-0120.

4. Upon the filing of the Title III Cases, the Debtors did not notify the Beltrán-Cintrón Plaintiff Group, nor any of its Members, of the Order for Relief, nor did they include the Cause of Action in its *Schedule H for Litigation Related Obligations*.

5. As of the Petition Date, the collective liability of the Commonwealth owed to the Beltrán-Cintrón Plaintiff Group is approximately \$85,000,000.00.

6. In accordance with Bankruptcy Rule 2019, the address for each Member is set forth in the Complaint against the Commonwealth, attached herein as Exhibit A. The individual amount of disclosable interest for each Member of the Beltrán-Cintrón Plaintiff Group is yet to be determined by the CFI. However, the nature of the disclosable economic interests for each Member is the same: the correction of the regular rate of pay due to the illegal implementation of the Memorandum 5-86 regulation, which resulted in inoperative pay scales⁴.

7. As of the date of this Statement, the undersigned represent the Beltrán-Cintrón Group⁵.

8. In addition, no individual Member of the Beltrán-Cintrón Group (a) assumes any fiduciary or other duties to any other creditor or person and (b) purports to act, represent or speak on behalf of any other entities in connection with the Title III Cases.

9. For the avoidance of doubt, nothing contained in this Statement (or Exhibit A hereto) is intended to or should be construed to constitute (a) a waiver or release of any claim(s) filed or to be filed against or interests in the Debtors in any title III case held by any Member, its affiliates or any other entity, or (b) an admission with respect to any fact or legal theory. Nothing

⁴ In the abundance of caution, the Beltrán Cintrón Group informs that each Member's disclosable economic interest was acquired more than one (1) year prior to the Petition Date. As such, the Group contends that they are waived from the disclosure requirements of FRBP 2019(c)(2)(C).

⁵ Counsel González-Morales also represents other Groups of creditors (which are unrelated to the Beltrán Cintrón Group) against certain other instrumentalities of the Commonwealth, each of which will be filing their respective separate Verified Statements in compliance with FRBP 2019.

herein should be construed as a limitation upon, or waiver of, any rights of any Member to assert, file and/or amend any proof of claim in accordance with applicable law and any orders entered in these cases.

10. The undersigned verify that the foregoing is true and correct to the best of their knowledge. Further, all rights to amend or supplement this Statement are fully reserved.

I HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case. We further certify that, on this same date, we served the foregoing upon all the Standard Parties as identified, defined and in the manner established in ¶ II of the Case Management and Administrative Procedures Order, as amended on April 4, 2018 (Dockets No. 2839 of Case No. 17-03283 (LTS), as well as upon all of the parties identified in the Master Service List maintained at <https://cases.primeclerk.com/puertorico/>.

RESPECTFULLY SUBMITTED,

San Juan, Puerto Rico, on this 29th day June 2018.

/s/ Ivonne González-Morales
IVONNE GONZÁLEZ-MORALES
USDC NUM. 202701
E-mail: ivonnegm@prw.net

IVONNE GONZÁLEZ-MORALES
PO BOX 9021828
San Juan, PR 00902-1828
Tel. (787) 410-0119

and

/s/ Milagros Acevedo-Colón
MILAGROS ACEVEDO-COLÓN
USDC NUM. 208213
E-mail: maclegaljc@gmail.com

MILAGROS ACEVEDO-COLÓN
Condominio Colina Real
Ave. Felisa Rincón 2000
Box 1405
San Juan, PR 00926
Tel. (787) 422-7622

Counsel for the Beltrán-Cintrón Group



GOBIERNO DE PUERTO RICO

Administración de los Sistemas de Retiro
de los Empleados del Gobierno y la Judicatura

ESTADO DE CUENTA ESTIMADO

28 de enero de 2019

Agencia: 408 - ADMINISTRACION DE SUSTENTO PARA MENORES

SONIA I REYES ORTIZ
TURABO GARDENS 2DA SECCION
K 56 CALLE 28
CAGUAS, PR 00727

Seguro Social: XXX-XX-2337

A base de la información en nuestros registros, al 28 de enero de 2019 usted posee:

Fecha de Nacimiento: 12 de noviembre de 1967

Género: Femenino

Fecha de Ingreso al Servicio Público: 01 de octubre de 1989

Fecha de Comienzo de Cotización: 01 de octubre de 1989

Ley Anterior al 30 de junio de 2013	Ley 3 al 30 de junio de 2017	Ley 106
Años Acreditados: 15	Tiempo Trabajado: 3.11	Tiempo Trabajado: 1.5
Aportaciones: 23,810.96	Aportaciones: 13,130.15	Aportaciones: 4,302.89
Intereses: 4,486.57	Intereses: 1,017.70	Intereses: 0.00
Gastos Teneduría: 0.00	Gastos Teneduría: 0.00	Gastos Teneduría: 0.00
Total Aportaciones: 28,297.53	Total Aportaciones: 14,147.85	Total Aportaciones: 4,302.89
SNC Pagado: 0.00		
SNC Tiempo: 0.00		
Beneficio: 513.68	Beneficio: 70.31	Beneficio: 0.00

Es importante destacar que el Balance de la Aportación Individual reflejada es la acumulación de la cantidad aportada a ASR a la fecha de la última nómina procesada en el Sistema. Los balances aquí reflejados por concepto de Aportación Individual y Años de Servicio están sujetos a revisión.

En caso de que la información no coincida con sus registros, deberá comunicarse con el Coordinador para Asuntos de Retiro de su Agencia o Municipio. Además, puedes acceder esta información a través de la sección Servicios en Línea del Portal de Internet de ASR: <http://www.asr.gobierno.pr>.

Le recordamos que previo a radicar una solicitud de pensión, deberá solicitar un Estado de Cuenta oficial a través de su Coordinador.

Cordialmente,

Unidad de Estado de Cuenta
Área de Participantes



IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM BECAUSE THEIR RECORDS SHOW THAT YOUR CLAIM IS DEFICIENT.

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
REYES ORTIZ, SONIA	33322	5/25/2018	Commonwealth of Puerto Rico	\$0.00
Reason:	Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors			

SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES SOLICITAN QUE SU RECLAMO SEA RECHAZADO, PUESTO QUE LOS DATOS INDICAN QUE SU RECLAMO ES DEFICIENTE.

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
REYES ORTIZ, SONIA	33322	5/25/2018	Commonwealth of Puerto Rico	\$0.00
Base para:	La evidencia de reclamación tiene la intención de formular las responsabilidades asociadas con el Estado Libre Asociado de Puerto Rico, pero no proporciona los fundamentos ni la documentación de respaldo para formular una reclamación contra el Estado Libre Asociado de Puerto Rico, de manera que los Deudores no pueden determinar si el reclamante tiene una reclamación válida contra el Estado Libre Asociado de Puerto Rico o cualquiera de los otros deudores en virtud del Título III.			

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*****CUST PR 1845 SRF 38154 PackID: 780 MMLID: 535613 SVC: 104th Omni**
REYES ORTIZ, SONIA
Urb. Altos de la Fuente
E-1 Calle 2
Caguas, PR 00727

OFICINA DEL GOBERNADOR
LA FORTALEZA
SAN JUAN, PUERTO RICO 00901



12 de abril de 1983

El 1ro de junio de 1983, comenzarás a recibir una bonificación especial que se te pagará de la siguiente forma:

\$50 el 1ro de junio de 1983
\$30 el 1ro de julio de 1983
\$50 el 31 de julio de 1983
\$30 el 31 de agosto de 1983
\$30 el 30 de septiembre de 1983

La bonificación que habrás de recibir además de tu sueldo, se logró con la aprobación de la Ley Núm. 12 de 27 de agosto de 1982. En tu caso particular representa una cantidad total de \$190 en un período de 4 meses.

Debido a que la situación económica de nuestro país continúa difícil y que tenemos compromisos y prioridades ineludibles, sometí legislación ante las Cámaras Legislativas con el propósito de implantar un plan por etapas encaminado a mejorar la condición retributiva de los empleados públicos.

Dicho plan entrará en vigor el 1ro de octubre de 1983, conforme a la Ley Núm. 12 de 27 de agosto de 1982, y a legislación sometida. En esta ocasión, el 1ro de octubre de 1983, recibirás un aumento de \$30 mensuales en tu sueldo regular que como tal será permanente y se habrá de considerar para los fines del cómputo de pensiones, de tu margen prestatario y para otros beneficios marginales.

-02-

Posteriormente, el 1ro de abril de 1984, o sea 6 meses después de haber recibido tu primer aumento en sueldo, entrarán en vigor nuevas escalas salariales, las que forman parte de un plan integral de retribución desarrollado por una firma consultora bajo la coordinación de la Oficina Central de Administración de Personal.

Las nuevas escalas de retribución que entrarán en vigor en estas fechas están desarrolladas en una base porcentual y superan en todos los tipos retributivos a las vigentes. La adopción de estas nuevas escalas te traerá un segundo aumento de sueldo. Este aumento será variable y su cuantía dependerá de la clasificación de tu puesto y del paso a que corresponda tu sueldo al entrar en vigor las nuevas escalas. En el caso de los empleados de carrera, el tipo mínimo vigente se incrementará desde \$57 hasta \$125 mensuales y, como te dije anteriormente, el aumento individual a recibir en dicha cantidad dependerá de la clasificación de tu puesto y del paso a que corresponda tu sueldo.

Para determinar el aumento neto que recibirás en virtud de las nuevas escalas de sueldos, deberás restarle el adelanto que ya se te habrá otorgado de \$30 mensuales a partir del 1ro de octubre de 1983, al efecto bruto que tendrán las nuevas escalas sobre tu sueldo individual.

En años fiscales futuros se implantarán las otras 2 etapas de la reestructuración salarial, de acuerdo a los recursos disponibles que conllevan revisiones de las estructuras salariales. Cuando se adopte la tercera etapa, los mínimos de las escalas vigentes para los empleados de carrera, se incrementarán desde \$169 mensuales hasta \$375 mensuales, dependiendo del nivel de clasificación.

Esta acción representa un esfuerzo adicional de nuestra Administración por hacer justicia a los trabajadores en el servicio público, cuyos salarios tradicionalmente se han mantenido por debajo de las tendencias retributivas que se registran en el sector privado. Además, constituye una forma de compensar irrevocablemente y en forma permanente a los empleados públicos, ya que los ajustes salariales se hacen de conformidad con la realidad presupuestaria de nuestro gobierno, así que puedes tener la seguridad de que los mismos se harán efectivos en las fechas en que se dispone y no serán cancelados ulteriormente.

Espero haber clarificado todo lo concerniente a la situación salarial de los empleados de carrera, según se proyectó por los aumentos propuestos a la Asamblea Legislativa y por la implantación de las nuevas escalas salariales al 1ro de abril de 1984.

Cordialmente,


Carlos Romero Barceló

Sonia I. Reyes Ortiz
Urb. Altos de la Fuente
E-1 calle 2
Caguas, P.R. 00727
Tel. 787 450-1373
soniareyes.ortiz@gmail.com
Claim# 33322

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of
THE COMMONWEALTH OF PUERTO RICO, et
al.,

Debtors. 1

PROMESA
Title III

No. 17 BK 3283-LTS
Jointly Administered)

**This filing relates to the
Commonwealth and ERS.**

OBJECCION

Yo Sonia I. Reyes Ortiz que resido en Urb. Altos de la Fuente calle 2 E-1 Caguas,
Puerto Rico 00727 que he trabajado en el gobierno de Puerto Rico en las siguientes
agencias:

Departamento del Trabajo y Recursos Humanos 1988-1989

Centro Judicial de Caguas, P.R. 1989-1990

Departamento de la Familia (Asume) 1995 hasta el presente

El Estado Libre Asociado de Puerto Rico me adeuda un ajuste de salario mínimo
federal y el patrono debe determinar cuanto es la cantidad. Adjunto documentación
solicitada.

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**VERIFIED STATEMENT PURSUANT TO FRBP 2019
OF THE BELTRÁN-CINTRÓN PLAINTIFF GROUP**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rule 2019”) and Section V.B. of the *Fourth Amended Notice, Case Management and Administrative Procedures Order* entered in Docket Entry 2839 on April 4, 2018 (the “Case Management and Administrative Procedures Order”), the present verified statement (the “Statement”) is submitted by the Group of those certain 4,953 Plaintiffs in the case of Francisco Beltrán-Cintrón *et al v.* Family Department of Puerto Rico *et seq.*, Civil Case Num. K AC2009-0809 in the Court of First Instance of San Juan (“CFI”), all creditors of the estate (collectively the “Beltrán-Cintrón Plaintiff Group”)².

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The present Statement is filed in accordance to the Case Management and Administrative Procedures Order in connection with the cases (“Title III Cases”) commenced by the above-captioned debtors under title III of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”).

In support of the Statement, the Beltrán-Cintrón Plaintiff Group hereby respectfully state as follows:

BACKGROUND

1. As of May 3, 2017 (the “Petition Date”) and up to and including the date of this Statement, in these Title III Cases, the undersigned counsel represented [and continues to represent] the Beltrán-Cintrón Plaintiff Group (each Plaintiff in the Group constitutes a “Member” thereof).

2. On November 2, 2009, the Beltrán-Cintrón Plaintiff Group filed a complaint against the Commonwealth, Civil Case Num. K AC2009-0805, seeking declaratory judgment for the nullity of General Memorandum 5-86 of the Central Office for the Administration of Personnel (“OCAP” for its initials in Spanish), and the consequent correction of the regular rate of pay due to the illegal implementation of such regulation, which resulted in inoperative pay scales (the “Cause of Action”). Therefore, for purposes of Bankruptcy Rule 2019(c), the Beltrán-Cintrón Plaintiff Group was formed on November 2, 2009.

3. As of the Petition Date, the Beltrán-Cintrón Plaintiff Group had been litigating the Cause of Action against the Commonwealth for seven (7) years, and a Motion for Summary Judgment with a Stipulation of Uncontested Facts with the Commonwealth had been filed and was under advisement of the CFI. As of the Petition Date, a determination by the Supreme Court of Puerto Rico, in Case Num. AC-2016-0110, as to whether the case should be entertained in the CFI or in the Administrative Forum (Appellate Commission of Public Service “CASP”), was pending³.

³ On January 27, 2017, the request for such determination in this case was consolidated by the Supreme Court of Puerto Rico with an identical request in the Case of Jorge Abraham-Giménez, Case Num. AC-2016-0120.

4. Upon the filing of the Title III Cases, the Debtors did not notify the Beltrán-Cintrón Plaintiff Group, nor any of its Members, of the Order for Relief, nor did they include the Cause of Action in its *Schedule H for Litigation Related Obligations*.

5. As of the Petition Date, the collective liability of the Commonwealth owed to the Beltrán-Cintrón Plaintiff Group is approximately \$85,000,000.00.

6. In accordance with Bankruptcy Rule 2019, the address for each Member is set forth in the Complaint against the Commonwealth, attached herein as Exhibit A. The individual amount of disclosable interest for each Member of the Beltrán-Cintrón Plaintiff Group is yet to be determined by the CFI. However, the nature of the disclosable economic interests for each Member is the same: the correction of the regular rate of pay due to the illegal implementation of the Memorandum 5-86 regulation, which resulted in inoperative pay scales⁴.

7. As of the date of this Statement, the undersigned represent the Beltrán-Cintrón Group⁵.

8. In addition, no individual Member of the Beltrán-Cintrón Group (a) assumes any fiduciary or other duties to any other creditor or person and (b) purports to act, represent or speak on behalf of any other entities in connection with the Title III Cases.

9. For the avoidance of doubt, nothing contained in this Statement (or Exhibit A hereto) is intended to or should be construed to constitute (a) a waiver or release of any claim(s) filed or to be filed against or interests in the Debtors in any title III case held by any Member, its affiliates or any other entity, or (b) an admission with respect to any fact or legal theory. Nothing

⁴ In the abundance of caution, the Beltrán Cintrón Group informs that each Member's disclosable economic interest was acquired more than one (1) year prior to the Petition Date. As such, the Group contends that they are waived from the disclosure requirements of FRBP 2019(c)(2)(C).

⁵ Counsel González-Morales also represents other Groups of creditors (which are unrelated to the Beltrán Cintrón Group) against certain other instrumentalities of the Commonwealth, each of which will be filing their respective separate Verified Statements in compliance with FRBP 2019.

herein should be construed as a limitation upon, or waiver of, any rights of any Member to assert, file and/or amend any proof of claim in accordance with applicable law and any orders entered in these cases.

10. The undersigned verify that the foregoing is true and correct to the best of their knowledge. Further, all rights to amend or supplement this Statement are fully reserved.

I **HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case. We further certify that, on this same date, we served the foregoing upon all the Standard Parties as identified, defined and in the manner established in ¶ II of the Case Management and Administrative Procedures Order, as amended on April 4, 2018 (Dockets No. 2839 of Case No. 17-03283 (LTS), as well as upon all of the parties identified in the Master Service List maintained at <https://cases.primeclerk.com/puertorico/>.

RESPECTFULLY SUBMITTED,

San Juan, Puerto Rico, on this 29th day June 2018.

/s/ Ivonne González-Morales
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Counsel for the Beltrán-Cintrón Group

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re: Financial Oversight & Management Board for Puerto Rico <i>as representative of</i> The Commonwealth of Puerto Rico, <i>et al.</i> Debtors	3:17-BK-3283 (LTS) PROMESA Title III (Jointly Administrated)
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NOTICE OF DEFECTIVE PLEADING
(Notificación de Documento Defectuoso)

The Clerk of Court has received your pleading on January 15, 2020. However, the deficiencies listed below have prevented us from filing the same in the case docket. You must submit a corrected pleading if you want it to form part of the record.

La Secretaría del Tribunal recibió su escrito el 15 de enero del 2020. No obstante, las deficiencias que abajo se señalan nos impiden aceptarlo y entrarlo en el sumario del caso. Debe usted someter un escrito debidamente corregido si quiere que el mismo forme parte del expediente.

NOTICE OF DEFECTIVE PLEADING
 (Notificación de Documento Defectuoso)
 3:17-BK-3283 (LTS)

1		Pleading is illegible. L.Civ.R. 10 (El escrito radicado es ilegible o no cumple con la R.L.Civ. 10)
2	X	Lacks proper signature. Documents presented to the court in paper require a handwritten signature. L.Civ.R. 11 (Documento no está firmado adecuadamente. Los documentos sometidos en papel tienen que estar firmados a mano. R.L.Civ. 11)
3		PROMESA Cover Sheet for Adversary Proceedings (DPR Modified PROMESA B1040) was not included. L.Bkcy.R. 7003-1 http://www.prd.uscourts.gov/promesa/forms-attorneys (No se incluyó la Hoja de Trámite para Casos Adversarios (DPR Modified PROMESA B1040).
4		Failure to pay the filing fee in the amount of \$400.00. See, L.Cv.R. 3.1(a). Payment shall be made within 24 hours in person at the Clerk's Office U.S. District Court with copy of the complaint /notice of removal. (Incumplimiento con el pago de la cuota de radicación por la cantidad de \$400.00. El pago debe hacerse personalmente dentro de 24 horas en la Secretaría del Tribunal Federal de Distrito adjuntando una copia de la demanda / notificación de remoción.)
5		Other:

Date: January 17, 2020

MARIA ANTONGIORGI-JORDAN, ESQ.
 Clerk of Court

By: s/ Marian B. Ramirez Rivera
 Marian B. Ramirez Rivera
 Deputy Clerk

sc: to filer with original filing attached

Sonia I. Reyes Ortiz
Calle 2 E-1
Caguas PR 00727

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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

Clerk's Office
United States District Court
Room 150 Federal BLDG
San Juan PR 00918-1767

